

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

DAVID DAGGETT, individually, and as a  
representative of a Class of Participants and  
Beneficiaries of the Waters Employee  
Investment Plan,

Plaintiff

v.

WATERS CORPORATION, ET AL.,  
Defendants.

Case No. 1:23-cv-11527-JGD

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**PLAINTIFF'S MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT**

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**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that on Thursday, April 3, 2025, at 11 a.m., in Courtroom 20 of the United States District Court for the District of Massachusetts, Boston, Massachusetts, the Court will conduct the Fairness Hearing. Plaintiff David Daggett ("Plaintiff") will and hereby does move this Court for an Order granting final approval of the parties' Class Action Settlement Agreement (Dkt. 67-1).

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and Section 2.3 of the Parties' Class Action Settlement Agreement and is based on the accompanying Memorandum of Law and authorities cited therein, the Declarations of Paul M. Secunda and Analytics

Consulting, LLC, and exhibits attached thereto, the previously filed declarations of the Class Representative (Dkt. 68), the Settlement Agreement, and all files, records, and proceedings in this matter. A proposed Final Approval Order is being submitted in connection with this motion as

**Exhibit 1.**

Defendants do not oppose the motion as parties to the Settlement.

Dated: March 17, 2025

Respectfully submitted,

**s/ Paul M. Secunda**

Paul M. Secunda (admitted *pro hac vice*)

**WALCHESKE & LUZI, LLC**

235 N. Executive Dr., Suite 240

Brookfield, Wisconsin 53005

Telephone: (262) 780-1953

E-Mail: psecunda@walcheskeluzi.com

Jonathan M. Feigenbaum

184 High Street, Suite 503

Boston, MA 02110

Telephone: (617) 357-9700

E-Mail: jonathan@erisaattorneys.com

*Attorneys for Plaintiffs and Settlement Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 17, 2025, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

**s/Paul M. Secunda**

Paul M. Secunda